## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:

Hernandez v. National Football League, et al.

No. 18-cv-00464-AB

## **DECLARATION OF DENNIS L. CURRAN**

**DENNIS L. CURRAN**, being duly sworn, deposes and says:

- 1. I am a Senior Vice President of the National Football League ("NFL") and General Counsel of the National Football League Management Council ("NFLMC"). The NFLMC is the sole and exclusive bargaining representative of the 32 Member Clubs of the NFL. I have been the General Counsel of the NFLMC since 1990. I make this declaration, on personal knowledge, in support of the NFL, the National Football League Foundation, and NFL Properties LLC's Opposition to Plaintiff's Motion to Remand.
- Attached as Exhibit 1 is a true and correct copy of the published version of the 2011 CBA between the NFLMC and the National Football League Players' Association ("NFLPA") dated August 4, 2011.
- 3. Attached as Exhibit 2 is a true and correct copy of the published version of the 2006 CBA between the NFLMC and the NFLPA dated March 8, 2006.
- 4. Attached as Exhibit 3 is a true and correct copy of the published version of the Constitution and Bylaws of the NFL, Revised as of June 1, 2010. The Constitution and Bylaws of the NFL originally became effective on February 1, 1970 and have been periodically revised over time, including the revision as of June 1, 2010. The June 1, 2010 revised version

remained in effect until the Constitution and Bylaws of the NFL were revised once again on September 14, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 15, 2018 at New York, New York.

Dennis I Curran